An Taisce
The National Trust for Ireland

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Anthony Donnelly
Tourism Policy Review
Department of Transport, Tourism and Sport
Government Buildings
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31.07.14

Re: Submission to the Draft National Tourism Policy for Ireland

Dear Mr Donnelly,

An Taisce welcomes the publication of a Draft National Tourism Policy for Ireland and would like to make the following comments which we request the Department take into consideration.

It is also requested that the Department make known to An Taisce any further consultation periods regarding the making of the policy and issue An Taisce with notification of any proposed amendments to the tourism policy.

Yours sincerely,

Tomás Bradley
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Submission to the Draft National Tourism Policy Statement for Ireland

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An Taisce, the National Trust for Ireland, is a membership-based charitable organisation committed to enhancing our quality of life, heritage and environment.

www.antaisce.org/membership

1.0 Introduction

Since its foundation in 1948, An Taisce has promoted outdoor recreation which remains a core concern of National Trusts across the world. In his 1948 Radio Eireann address An Taisce founder Robert Lloyd Praeger referred to 'the provision of open spaces large and small for the health and enjoyment of the people'. The early campaign work of An Taisce focused on the protection of Bray and Howth Heads, the Wicklow Uplands and the Killarney area.

An Taisce can play a lead role, both at home and abroad in the promotion of tourism and outdoor recreation. The imagery used by Fáilte Ireland in its current campaigns is based on the quality of landscapes and attractive towns and villages. The focus of An Taisce's involvement in planning during the boom years was to protect this legacy, for which we were often condemned by vested development interests and politicians alike.

Outdoor recreation is a key part of health and well being in a society where sedentary suburbanised lifestyles prevail. It brings understanding of the wealth of the natural world, the changes in season and our dependence on a healthy environment and stable climate. Emphasis should be placed on the marketing of walking and cycling trips and eco-tourism.

2.0 Tourism & Climate Change

The current Mission Statement of the Department of Transport, Tourism and Sport states:

> *To ensure that the transport, tourism and sport sectors make the greatest possible contribution to economic recovery, fiscal consolidation, job creation and social development.*

This entirely disregards the overriding requirement to maintain the existing global environment and stable climate, without which existing social and economic structures would collapse. This Mission Statement needs to be abandoned, in favour of new statement addressing the overriding imperative to address climate change mitigation.

Climate change and fossil fuel dependence are the interrelated, biggest and defining challenges of our time. We are currently experiencing an environmental and resource crisis that places human development at a crossroads. The consequences of climate change and fossil fuel extraction and combustion are becoming increasingly visible and are being exacerbated by unsustainable economic growth.

The effects of these challenges are, and will continue to be, multi-faceted and systemic. They will have effects on all strands tourism. Effects include, for example, energy price inflation, increased flooding, and increases in the cost of resource dependent production, food shortages and other scarcities.

These challenges, and the necessary development of policies to address them, are becoming a reality with which society has to learn to live. Risks of climate change are of a different order than any of the others. Climate change is *sui generis* - a category of risk without precedent in human history, one that acts as a threat multiplier in all areas of public policy including investment, property value, economic well-being, social protection, public health and national security.

Therefore, future tourist development and visitor promotion must now focus on climate and resource protection. The high level of energy consumed by aviation, cruise liners and recreational travel is no longer tenable.

In common with environmental NGO's across the world An Taisce has taken a strong stand against air travel growth making a legal complaint to the EU approved subsidy of six regional Irish airports including Knock and Sligo for flights to Dublin, something which has been partially addressed in cuts to date. The proposal to extend Sligo airport to accommodate longer distance jets by pushing the runway out to the sea, was knocked out by a legal challenge. An Taisce similarly raised serious concern with regard the Dublin Airport Northern Runway and Terminal 2 projects.

The Kyoto Protocol failed to address or even quantify shipping and aviation emissions nor is there any political will to confront this in future agreements. The emissions from a longer cruise liner trip are as problematic as a plane trip and are usually linked to air travel to and from the cruise start and return port. The climate pollution emissions from a single

transatlantic flight are greater on a per capita basis than the yearly impact of a native of sub Saharan Africa.

A concern for emissions is not the only reason to reverse Ireland's current tourist dependence on aviation:

- The future cost of fossil fuel is unpredictable and the range of subsidies for aviation including fuel tax evasion, are no longer tenable.
- Changing weather patterns and an increase in more intensive weather conditions and natural disasters

The 2010 Icelandic volcano eruption also showed the vulnerability of jet aviation to natural events. For a range of reasons there is a particular urgency for Ireland to develop a more carbon and time efficient link between Ireland and the UK.

This requires the development of new low emission cross channel ferries to Britain and the continent and the continuation of the electrification of the London to Holyhead line from Crewe through Wales. This should be a national transport priority with support sought from the UK Government.

Tourism development and marketing hotels based on continuing and increased car hire, cross channel or continental ferry use for cross country driving needs to be reviewed. This includes the Fáilte Ireland promotion of the Irish Atlantic coast as a 2500km driving route - 'The Wild Atlantic Way'. In contrast Wales has become the first country in the world to have a formal walking trail the whole distance around its 1400km coast which was completed in 2012.

Recommendation

- A primary objective of this policy statement must be to break the tourism sector's dependence on oil, stopping the tourism sector's contributions to global warming and preparing the tourism sector with the resilience to thrive in a time of energy and climate uncertainty.

- The Department of Transport, Tourism and Sport should prepare and adopt a local Climate Change Strategy in parallel with the preparation of this policy statement.

- The policy statement should include an '*Oil Vulnerability & Carbon Price Impact Assessment'* to explore the threats from inflated and volatile oil prices together with the future (shadow) price of carbon. This should be undertaken for both capital and operational functions.

- The policy statement should discontinue any objectives which provide for investment in oil dependent infrastructure.

- The policy statement should include specific objectives to enhance new low emissions cross channel ferries to Britain and the continent and work with the governments of the United Kingdom to promote the electrification of the London Holyhead line from Crewe through Wales.

- The policy statement must be carefully aligned with the regional transport strategies of the National Transport Authority (NTA), particularly with respect to rail infrastructure and bus services.

3.0 Tourism & Tax Relief

During the 1990's and the early years of the last decade, tourism in Ireland has been fuelled by building tax relief rather than any real strategy. Schemes for the upper and middle Shannon counties and seaside holiday resorts were accompanied by poor planning control and an uncritical local attitude to development. An Taisce took a major role in successfully appealing some of the most inappropriately located developments notably around Lough Allen and the Shannon to An Bord Pleanála.

The tax relief given to hotel development was a contributing part to the unsustainable Irish construction boom and property collapse. In 2009, the Irish Hotels Federation commissioned a report establishing that the country now has a surplus of hotel bedroom capacity of 15,000 spread widely across the country. Many of these were in poorly designed 4 or 5 storey blocks located on surface car parks near road interchanges outside urban areas and have undermined the viability of traditional town centre hotels. The tax schemes also fuelled the development of golf resorts which damage the character of major country house estates.

The most controversial proposal of recent years has been the 'Tipperary Venue' for a Las Vegas type casino, a full scale replica of the White House, 15,000 seating capacity event venue and a new race course which would lead to the closure of 3 existing venues in Munster. The scheme could not possibly be a more inappropriate model for tourism in Ireland. An Taisce was the leading appellant against the scheme, arguing that tourism and recreational development should focus on the existing natural and cultural endowment. Permission was granted by An Bord Pleanála excluding certain elements, but development has not proceeded. Another problematic proposal also linked to a likely casino application was for a Dubai type indoor ski slope beside Dundalk Racecourse. This application was refused.

VAT relief on retail purchases by foreign visitors is also an unsustainable model. It forms the basis of the international marketing of the Kildare Retail Village where a major expansion proposal was granted by An Bord Pleanála in 2013 with the support of Fáilte Ireland. This was justified on the basis of attracting long distance retail tourism from new markets such as China to buy goods imported into Ireland which paradoxically in a large part sourced in Asia and China in the first instance. No evaluation was made on the impact of promoting increased long haul aviation. At the same time developments such as Kildare Village undermine historic retail centres in Ireland.

Recommendation

- Any tax relief measures should be evidence based and targeted at a range of geographical and segmental markets and should not increase unsustainable consumption.

4.0 Promoting Eco-Tourism

The challenge for the future is to better promote Ireland for tourism and outdoor recreation both within the country and to our nearest neighbours. A good example has been set by the cycling/walking route created on the abandoned Westport railway line. The leadership for rural recreational tourism is best achieved by fostering local co-operative and community initiatives, such as the example lead in the Ballyhoura Hills area in County Limerick.

A proposal for a national cycle network has now been put forward by the National Transport Authority and needs to be given priority over further over scaled road investment. Future tourism development will be detrimental unless a progressive reduction in current levels of transport greenhouse gases is achieved. This means less short trips particularly city breaks, longer trips, more home tourism and more travel between countries nearer each other than further. There are many areas of economic development and resource consumption that have to be curtailed if we are to maintain a living planet. Outdoor recreation tourism based on low fossil fuel consumption and emissions in both travel and accommodation is one of the areas where growth is sustainable.

Walking, trekking, cycling and canoeing and other outdoor activities for different ages and abilities can be managed with low environmental impacts and achieve multiple benefits in health, well being, environmental protection and maintenance of local economies.

A coordinated approach is required in future management of Leader supported investment. This Rural Development Programme 2014-2020 provides a 41m million allocation to Leader projects. This needs to be spent in a coherent and strategic way focusing on the development and support of clusters of recreation and outdoor activity in particular.

Recommendation

- A primary objective of this policy statement should be to promote Ireland for tourism and outdoor recreation including the advancement of a national cycle network.
- The policy statement must include permeability and way-finding studies to identify a safe network of existing/future walking and cycling routes which must be used as chief criteria in promoting new tourism development connecting with key services and amenities.
- The policy statement needs to place an emphasis on slow modes of transport. The National Cycle Policy Framework includes practical measures to help achieve the key objectives of this policy. The framework takes a methodical approach to investment and has an unquestioned research base.

5.0 Driving Economic Opportunities

The policy statement places particular emphasis on the importance of the economy. It should be remembered **the economy is a 'wholly-owned subsidiary' of the natural environment** – on the island of Ireland, regionally and globally**.** An unhealthy environment will result in an unhealthy society and economy and ultimately in collapse of the ecosystems on which society and civilisation depends. Although the link between sustainable economic development and natural resources has been widely ignored and eschewed by conventional economic policy makers, the onset of climate change and energy scarcity is precipitating a long overdue reappraisal of this costly misjudgement.

Understandably much of the current national political and media focus is on promoting economic development and employment. All mainstream commentators and politicians eulogize the accepted wisdom of the virtues of a return to economic growth as the conventional solution to our current economic, unemployment and fiscal difficulties.

However, it should be borne in mind that there is an inherent contradiction between the current model of economic growth and environmental and resource sustainability. Our society is currently locked into an economic system that has a GDP growth imperative that is based on increasing fossil fuel energy demand, increased greenhouse gas emissions, especially from transport and agriculture, and increased resource throughput and depletion. Our ecological debts are as unstable as our financial debts. Neither is properly accounted for in the relentless pursuit of unsustainably-based consumption growth. This contradiction is placing further pressure on the carrying capacity of the environment to support society and the economy.

Furthermore, GDP economic growth is a highly imperfect and counter-productive measure of human progress as it measures only income and does not account for the consumption of natural capital (resources), social inequality or the significant costs of anthropogenic pollution[1].

For example, a 2 per cent per annum growth in GDP would mean the carbon occasioned by each unit of economic output would have to be 130 times lower in 2050 than it is today otherwise we cross a threshold in terms of carbon emissions from which future generations are unable to recover. Economic growth is therefore inconsistent with the requirement to abate greenhouse gas emissions or reduce oil dependency. In any event, 2% GDP growth would mean the total size of the Irish economy would double every 35 years. This is not physically possible in a finite world and we should therefore not be planning for it. To seek to double the size the economy over the next 30 to 40 years is counterproductive; to meet with success with such a wrong-headed objective is to further impoverish our children and their children.

Current Government policy is to promote the Smart Economy and a return to an export-led economy. While this strategy has many virtues it is based on the premise that Ireland cannot compete with manufacturing industries in low-cost developing nations in a globalised economy. As a consequence, the structure of modern developed economies such as Ireland has typically tended to move progressively away from domestic

[1] Prosperity without Growth – The Transition to A Sustainable Economy, UK Sustainable Development Commission, 2009

manufacturing resulting in more and more finished and semi-finished goods needing to be imported from abroad and expanding the financial and services sector to pay for it. Of course, this strategy is extremely vulnerable to global economic instability, oil price inflation (for transport) and outsources environmental degradation to less regulated countries.

Current national economic development policies demonstrate a long-term blindness to the limitations of the physical world. Responses to the crisis which aim to restore the status quo are misguided and doomed to failure. Income today means nothing if it undermines the conditions upon which the prosperity of tomorrow depends.

Continued GDP economic growth in the Irish economy is unlikely and, in any event, is unsustainable in the long-term. It is prudent to plan now for a different economic future including low-growth, no-growth or contraction scenarios. The tourism policy must move quickly to a plan to accommodate higher and more volatile energy prices (and high material costs too) and to use this window of opportunity to transition the country into a post-carbon, low energy, low consumption and resilient state.

Recommendation

- Given the impacts of energy scarcity continued GDP economic growth in the Irish economy is unsustainable in the long-term. It is prudent to plan now for a different economic future including low-growth, no-growth or contraction scenarios.

- In light of conventional peak oil, the policy statement must plan for higher and more volatile energy prices (and high material costs too) and to use this window of opportunity to transition the Ireland's tourism into a post-carbon, low energy, low consumption and resilient region

6.0 Implementation & Monitoring

Over the past fifteen years there has been no shortage of very well intentioned policy statement documents published in Ireland by Government, Quasi-Government and Non-Governmental Organisations. However, the reality has been (and remains) a widespread absence of implementation and an almost complete **divergence between policy and practice**. Policy guidance documents have been heretofore habitually ignored in favour of pressing short-term economic requirements, the requirement to promote commercial rate revenue and lobbying from special interest groups. As a result and it must be recognised, the direct legacy of the recent 'Celtic Tiger' era and associated expansion in construction activity is that Ireland now has one of the most unsustainable, economically inefficient, structurally weak and spatially dispersed settlement patterns anywhere in Europe. **In the current economic circumstances within which Ireland finds itself, there is a very real danger that we will revert to the failed and near-sighted *'all development is good development'* mantra of the past without paying adequate attention to the long-term consequences and costs.**

It is, therefore, submitted that it is now, more than ever, of paramount importance that the any policy for tourism moves beyond the mere rhetoric of commendable policy objectives and towards **robust targets, actions and measures** to achieve the tangible implementation and a transition to a low-carbon, low-energy and sustainable society. Implementation of policy has been the Achilles heel of development in Ireland and must therefore now at this critical juncture be the focus of this tourism policy.

In recent years political decision-making has been brought into disrepute while having calamitous consequences. More than ever this tourism policy is required to address the major challenges of our time.

Recommendation

- The policy statement must include a detailed implementation and monitoring schedule which outlines the manner in which the statement envisages the future development of the tourism sector.
- A designated implementation group must be appointed to oversee the implementation of the tourism policy and ensure joined up thinking between all government departments.

7.0 Conclusion

This tourism policy must provide a transition to a low-carbon society and economy and to mitigate the significant risks associated with rising energy costs and climate change adaptation. The tourism policy must be methodical, evidence-based in approach and demonstrate rational 'joined up' assessment of all strands of tourism.

Business-as-usual is no longer an option, change is required in governance, societal behaviour and economics. The tourism industry can no longer afford to continue the pursuit of the failed, short-sighted policy approaches of the past and must ensure that our collective future will contribute to reducing avoidable risks and building resilience to damaging impacts of energy scarcity and climate change.

The international and national economic recession has provided a narrow window of opportunity to take action to concentrate investment and focus policy on the transition to a post-oil, low-carbon, globally respectful and locally resilient society. This is the major challenge of our time and requires urgent understanding of the nature and scale of the unprecedented consequences which will confront us if we do not take dramatic action in the near-term.

This will require decisive political leadership and a radical change of direction together with robust and, in some instances, radical policy implementation which only be politically acceptable in the near-term if the risks are effectively communicated to the public. The coordinated actions of all government departments are critical to effective action and the statutory planning system, through the regulation of physical development and land use, has a critical role to play in facilitating this transition.

The success or otherwise of the forthcoming tourism policy can only be judged against verifiable and implementable criteria which are subject to ongoing monitoring.